

REMARKS

Claims 1 through 40 are currently pending in the application.

This amendment is in response to the Office Action of June 28, 2005.

35 U.S.C. § 112 Claim Rejections

Claims 1 through 40 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Applicant has amended the claimed invention to comply with the provisions of 35 U.S.C. § 112, second paragraph to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Therefore, presently amended claims 1 through 40 are allowable under the provisions of 35 U.S.C. § 112.

35 U.S.C. § 103(a) Obviousness Rejections

Obviousness Rejection Based on Rosenfield et al. (U.S. Patent 4,752,668) in view of Tateyama et al. (U.S. Patent 5,442,416)

Claims 1 through 40 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Rosenfield et al. (U.S. Patent 4,752,668) in view of Tateyama et al. (U.S. Patent 5,442,416). Applicant respectfully traverses this rejection, as hereinafter set forth.

Applicant asserts that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicant's disclosure.

After carefully considering the cited prior art, the rejections, and the Examiner's comments, Applicant has amended the claimed invention to clearly distinguish over the cited prior art.

Turning to the cited prior art, the Rosenfield et al. reference teaches or suggests a system for removing excess material from a semiconductor wafer employing an excimer laser for ablative photocomposition. The Rosenfield et al. reference contains no teaching or suggestion whatsoever of the use of the excimer laser except as an independent device.

The Tateyama et al. reference teaches or suggests a resist processing system including at least two robots for conveying a wafer, a passage through which the robots can move, plural process units arranged along the passage, and a waiting unit for temporarily holding the wafer to be processed. The Tateyama et al. reference contains no teaching or suggestion whatsoever of the use of the resist processing system except as an independent device.

Applicant asserts that there is no suggestion whatsoever in either the Rosenfield et al. reference or the Tateyama et al. reference for any combination thereof. Applicant asserts that the only suggestion for any combination of the cited prior art is contained solely within Applicant's disclosure, not the cited prior art.

Therefore, presently amended independent claims 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 32, and 37 are allowable as well as the dependent claims therefrom as the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions.

Applicant further asserts that there has been no showing of success for any combination of the Rosenfield et al. reference or the Tateyama et al. reference to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions of presently amended independent claims 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 32, and 37 because there is no suggestion in the cited prior art for any combination thereof. Applicant asserts that solely Applicant's disclosure can serve as a basis for any showing of success for any combination of the cited prior art.

Therefore, presently amended independent claims 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 32, and 37 are allowable as well as the dependent claims therefrom as the cited prior art does not and

cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions.

Further, Applicant asserts that any combination of the Rosenfield et al. reference and the Tateyama et al. reference fails to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions of presently amended independent claims 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 32, and 37 because any combination of the cited prior art fails to teach or suggest all the claim limitations of the claimed inventions. For instance, Applicant asserts that any combination of the cited prior art fails to teach or suggest the claim limitations of the presently claimed inventions of presently amended claims 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 32, and 37 calling for “providing a substrate having a surface in the automolding system”, “providing a substrate having a surface for molding in the system”, “providing a substrate having a surface for molding in the system”, and “removing contaminants from the substrate using a laser”. In contrast to the claim limitations of the presently claimed inventions, any combination of the cited prior art, at best, teaches or suggests the use of an independent resist apparatus and an independent laser resist removal. Clearly, such is not the presently claimed inventions.

Therefore, presently amended independent claims 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 32, and 37 are allowable as well as the dependent claims therefrom as the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions.

Finally, Applicant asserts that any rejection of the presently claimed inventions of presently claimed inventions of presently amended independent claims 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 32, and 37 based upon any combination of the cited prior art Rosenfield et al. reference and the Tateyama et al. reference is a hindsight reconstruction of the presently claimed inventions based solely upon the Applicant’s disclosure, not the cited prior art. Such a rejection is neither within the ambit nor the purview of 35 U.S.C § 103 and, clearly, improper.

Therefore, presently amended independent claims 1, 4, 7, 10, 13, 16, 19, 22, 25, 28, 32, and 37 are allowable as well as the dependent claims therefrom as the cited prior art does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed inventions.

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Applicant submits that claims 1 through 40 are clearly allowable over the cited prior art.

Applicant requests the allowance of claims 1 through 40 and the case passed for issue.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "James R. Duzan". The signature is fluid and cursive, with a prominent initial "J" and a stylized "D".

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